

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of)	
)	
Application of Verizon New Jersey, Inc., Bell)	
Atlantic Communications, Inc. (d/b/a Verizon)	
Long Distance), NYNEX Long Distance)	WC Docket No. 02-67
Company (d/b/a/ Verizon Enterprise)	
Solutions), Verizon Global Networks, Inc., and)	
Verizon Select Services, Inc., for)	
Authorization to Provide In-Region)	
InterLATA Services in New Jersey)	

MOTION OF AT&T CORP. FOR EMERGENCY RELIEF

Pursuant to Rule 1.41 of the Commission's Rules, AT&T Corp. ("AT&T") respectfully submits this Motion for Emergency Relief to remedy Verizon's violations of section 271(a) of the Communications Act of 1934, 47 U.S.C. § 271(a).

BACKGROUND AND SUMMARY

Verizon has sought (for the second time), but has not been granted, authority to "provide" interLATA services in New Jersey. It is therefore flatly unlawful for Verizon to provide long distance services in New Jersey now or, indeed, to have *any* long distance involvement that enables it to obtain a competitive advantage. *See, e.g.*, 47 U.S.C. §§ 271(a), (b)(1); *Qwest Teaming Order*, 13 FCC Rcd. 21438, ¶ 37 (1998) ("[I]n order to determine whether a BOC is providing interLATA service within the meaning of section 271, we must assess whether a BOC's involvement in long distance markets enables it to obtain competitive advantages.").

Notwithstanding this clear and well-established prohibition, Verizon conceded in a May 31, 2002 *ex parte* that it has been doing precisely what is prohibited. Specifically, Verizon admits that its agent mailed thousands of letters stating that "Verizon Long Distance is now

available in New Jersey,” urging consumers to sign up for those long distance services and even supplying a blank letter to be signed by the consumer authorizing “Verizon Long Distance” to become the consumer’s preferred carrier for long distance services.¹ In other words, Verizon is holding itself out to the New Jersey public as a provider of long distance services – and hence as a full service, single bill telephony provider before the Commission has determined that Verizon’s local markets have been opened fully to competition. That is the very competitive advantage that section 271 was designed to prevent, and it quite plainly and irreparably harms both the public interest and AT&T and other competitors that do have long distance authority.²

Verizon’s *ex parte* attempts to downplay its responsibility for this clear violation. Verizon does *not* contend, however, that the direct mail company disregarded Verizon’s instructions and mailed the letters earlier than the date Verizon had selected. Rather, Verizon contends only that it “intended” that the New Jersey letters not be mailed “until after it is authorized to offer long distance service in New Jersey.” VZ May 31 Letter at 1. The only possible plain-English interpretation of that carefully-crafted language is that Verizon assumed that its New Jersey application would be rubber-stamped well in advance of the statutory deadline and brazenly directed its marketing representatives to act accordingly. Only when that gamble failed to pay off and Verizon became concerned that the Commission would catch wind

¹ See Letter from Dee May (Verizon) to Marlene H. Dortch (FCC Secretary), WC Docket No. 02-67 (dated May 31, 2002) (“VZ May 31 Letter”) (attached hereto as Exhibit 1).

² See *Qwest Teaming Order* ¶ 5 (“Congress recognized that, unless the BOCs had some affirmative incentive to open their local markets to competition, it would be highly unlikely that competition would develop expeditiously in the local exchange and exchange access markets. Accordingly, section 271(a) allows a BOC to enter the in-region, interLATA market, and thereby offer a comprehensive package of telecommunications services (*i.e.*, one-stop shopping for local and long distance service), only after it demonstrates, among other things, compliance with the interconnection, unbundling, and resale obligations that are designed to facilitate competition in the local market.”)

of its violations did Verizon deign to inform the Commission and to take superficial remedial action. This misconduct alone calls into serious question whether Verizon can be expected to comply with conditions required for approval of its section 271 application.

But the violations that Verizon disclosed to the Commission in its May 31 *ex parte* are apparently only the tip of its unlawful and anticompetitive New Jersey iceberg. At the same time that Verizon was disclosing to the Commission its unlawful direct mailings to consumers, it was apparently including bill inserts in its New Jersey customers' bills – and virtually *all* New Jersey consumers are Verizon customers – expressly stating: “[n]ow that Verizon Long Distance is available in New Jersey [j]ust sign up.”³ In the billing insert, Verizon explains that “[w]hen you sign up . . . you’ll see your local, regional toll and long distance services all together with ONE-BILL.” According to press reports, Verizon sent these false and unlawful billing inserts to more than 500,000 New Jersey customers. Bloomberg, *Verizon Retracts Long-Distance Calling Offers in New Jersey* (June 12, 2002). This improper use of a ubiquitous marketing channel available to Verizon only because of its historic monopoly is truly unprecedented. Moreover, there can be little doubt that Verizon was aware of this additional misconduct when it filed its May 31 *ex parte*. And Verizon’s failure to identify this conduct in its May 31 *ex parte* – and its apparent failure to take any steps at that time to remedy these additional violations – sheds a long shadow over Verizon’s claims that it has taken appropriate measures to inform customers of its error, and that Verizon is not adding customers that respond to those advertisements to a list for future targeted marketing activities.

³ A copy of the billing insert, which was received by AT&T employees on June 10 (and apparently mailed on June 5 and thus prepared well in advance of that date) is attached hereto as Exhibit 2.

Such egregious misconduct simply cannot go unrecognized – or unpunished – by the Commission. It is becoming increasingly clear that the Bell Operating Companies (“BOCs”) no longer take section 271 – or the Commission’s critical role in enforcing that core provision of the 1996 Act – seriously, and any failure to respond swiftly and severely to Verizon’s misconduct would only encourage further backsliding.⁴

Accordingly, AT&T respectfully requests that the Commission immediately take the following remedial steps. *First*, the Commission should enter a standstill order expressly directing Verizon immediately to cease and desist from advertising that it has long distance authority in New Jersey (or any other state in which it does not, in fact, have such authority) or otherwise holding itself out as a long distance provider. As detailed below, the Commission has clear authority under section 4(i) of the Communications Act and has not hesitated to exercise that authority to grant similar relief in similar circumstances. *See Ameritech Standstill Order*, 13 FCC Rcd. 14,508 (1998).

Second, the Commission should direct Verizon to submit a sworn statement by June 17, 2002 that details: i) the scope of the impermissible mailings; ii) the number of customer inquiries received in response to the mailings; iii) how those inquiries were handled by Verizon employees, including whether any Verizon employees offered to change the customer’s primary interexchange carrier or to place the customer on any type of “waiting list”; iv) what remedial steps have been taken to notify customers of the false statements; and v) and what steps Verizon is taking to prevent further such violations of section 271. In addition, Verizon should be

⁴ *See, e.g., SBC NAL Consent Decree*, 2002 WL 1050041 (May 28, 2002) (SBC agreeing to pay \$3.6 million fine in connection with false statements made to the Commission to secure section 271 authorization in Texas, Kansas, Oklahoma and Missouri).

directed to submit to the Commission all documents relating to the improper billing inserts, including any customer representative instructions or “scripts” for responding to inquiries.

Third, the Commission should open a broader inquiry into the scope of Verizon’s attempts to jump the gun in New Jersey. It is clear from Verizon’s failure to disclose the offending bill inserts that the Commission and the parties do not yet know the full extent of Verizon’s unlawful campaign to gain competitive advantages in New Jersey (and perhaps elsewhere) before it obtains legal authority to provide long distance services.

Fourth, the Commission should deny the Verizon application in this proceeding. AT&T has already demonstrated that Verizon does not satisfy the Act’s standards for providing long distance in New Jersey because it has not met the checklist and New Jersey local markets are not open for competition.⁵ Verizon’s violations of the Act now provide a further, independent ground for the Commission to reject Verizon’s pending application. The Commission has made clear that the “public interest” standard of section 271(d)(3)(C) is not met where there is “evidence that a BOC applicant has engaged in discriminatory or other anticompetitive behavior, or failed to comply with state and federal telecommunications regulations.” *Michigan 271 Order*, 12 FCC Rcd. 20543, ¶ 297 (1997). Until Verizon’s patent violations of the Act are fully identified and remedied, it cannot obtain authority to provide long distance in New Jersey.

⁵ At a minimum the Commission should suspend this application until such an investigation is concluded. But, if Verizon refuses to consent to such a suspension, the only appropriate course is an outright denial.

ARGUMENT

I. VERIZON IS PROVIDING INTERLATA SERVICES IN NEW JERSEY IN VIOLATION OF SECTION 271(a).

Verizon's violation of the Act is patent. Section 271(a) prohibits a BOC from "providing" interLATA services in an in-region state prior to obtaining authorization from the Commission. Verizon has not received the necessary authorization for New Jersey.

In its *Qwest Teaming Order*, the Commission broadly interpreted "provide" consistent with the pro-competitive purposes of the Act to open monopoly markets to competition. *Qwest Teaming Order* ¶¶ 35-37. There, the Commission addressed the legality of "teaming agreements" between Qwest and US WEST and Ameritech in which the BOCs marketed a package of local and long distance services. *Id.* ¶¶ 9-16. The BOCs claimed that this was permissible because Qwest was the "actual" carrier of the long distance component of the package and that BOCs were "merely marketing" Qwest services. *Id.* ¶ 50. The Commission squarely rejected the BOCs' argument that "provide" should be read to cover instances only when a BOC "actually transmit[s]" interLATA information or "acts as a reseller of . . . interLATA services." *Qwest Teaming Order* ¶ 26. Instead, the Commission expressly found that "marketing" of long distance services by a BOC can violate Section 271(a). *Id.* ¶ 35.

In so holding, the Commission established a straight-forward test for determining whether a BOC's involvement in the long distance market constitutes "providing" long distance. "[I]n order to determine whether a BOC is providing interLATA services within the meaning of section 271, we must assess whether a BOC's involvement in the long distance market enables it to obtain competitive advantages, thereby reducing its incentive to cooperate in opening its local market to competition." *Qwest Teaming Order* ¶ 37. Measured against this standard, Verizon is clearly "providing" long distance in New Jersey prior to obtaining Commission approval.

Verizon is expressly holding itself out today as a “one-stop” source for local and long distance services that other carriers cannot match. That clearly gives it the precise type of competitive advantage over other providers that section 271 was designed to prevent.

Verizon’s violation is so stark that it meets all three factors examined by the Commission in the *Qwest Teaming Order* to determine whether the “totality” of a BOC’s “involvement” with long distance services amounts to “providing in region, interLATA services in violation of section 271.” *Qwest Teaming Order* ¶ 38. First, the Commission looks to whether the BOC’s activities allow it “to obtain material benefits . . . uniquely associated with the ability to include a long distance component in a combined service offering.” *Id.* ¶ 37. The principal “unique” benefit identified by the Commission is the ability to offer “one-stop shopping.”⁶ Here, as described above, the bill inserts mailed by Verizon expressly tout its ability to provide customers such one-stop shopping.

Another key “material benefit[] uniquely associated with the ability of the BOCs to include a long distance component of service” identified by the Commission is whether a BOC is able to gain a “significant ‘jumpstart’ when they obtain 271 authorization.” *Id.* ¶ 41. By telling customers that Verizon is in the long distance market today, Verizon is gaining an even greater “jumpstart” than Ameritech and US WEST gained when they joint-marketed Qwest-branded long distance to their customers.

Second, the Commission analyzes whether the BOC is “effectively holding itself out as a provider of long distance service.” *Id.* ¶ 37. This is not even a close call. The bill inserts mailed

⁶ *Id.* ¶ 39 (“Although Congress contemplated that the framework it enacted would enable the BOCs to obtain the benefits associated with being a provider of long distance services, such as the ability to offer one-stop shopping, we do not find that Congress intended for the BOCs to
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to Verizon's captive customer base state: "[n]ow that Verizon Long Distance is available in New Jersey . . . [j]ust sign up" and that "[w]hen you sign up . . . you'll see your local, regional toll and long distance services all together with ONE-BILL." Thus, like US WEST and Ameritech did in 1998, Verizon is "holding [itself] out to consumers as being able to provide long distance service, under their exclusive brand name, [and therefore] are competing in the in-region, interLATA marketplace before they are authorized to enter this market." *Id.* ¶ 45.

Third, the Commission looks to see whether the BOC is "performing activities and functions that are typically performed by those who are legally or contractually responsible for providing interLATA services to the public." *Id.* ¶ 37. In the *Qwest Teaming Order*, the Commission found this factor present because Ameritech and US WEST had exercised significant control over the structure and price of the long distances services that were purported to be offered by Qwest. *Id.* ¶ 46. Again, the case here is even stronger. Verizon is not merely exercising "strong prospective influence over the prices, terms, and conditions of the long distance services," *id.* ¶ 47; rather, Verizon itself has unilaterally set those prices, terms and conditions and marketed that service directly to the public. Similarly, the number provided by the Verizon bill insert directs New Jersey residents to call Verizon's customer care center where they deal directly with Verizon employees.

In sum, Verizon's conduct plainly violates section 271(a). As the Commission has explained, "[a]n arrangement in which a BOC would offer the services of its marketing department to market and sell a long distance product" would be a "permissible marketing arrangement." *Id.* ¶ 50. However, any actions that go beyond this, such as "mak[ing]

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obtain these benefits, prior to demonstrating compliance with the marketing opening provisions
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representations that such product or service is *associated* with its name or service,” or “performin[ing] customer care functions in connection in connection with the long distance services,” the BOC has crossed the line and is “providing” long distance. *Id.* (emphasis added).

II. THE RELIEF REQUESTED BY THIS EMERGENCY MOTION IS WITHIN THE COMMISSION’S AUTHORITY AND JUSTIFIED BY THE EGREGIOUS NATURE OF VERIZON’S VIOLATIONS.

A. The Commission Should Order Verizon To Cease And Desist Its Violations Of The Act.

As explained above, Verizon’s mailings are a patent violation of Section 271. The Commission should accordingly order that Verizon cease and desist from sending out any further inserts until it obtains the necessary authorization from the Commission to provide long distance service in New Jersey.

There can be no doubt that the Commission has authority to issue the interim injunctive relief sought by AT&T. Section 4(i) of the Act authorizes the Commission to issue those orders “as may be necessary in the execution of its functions.” This broad language, as recognized by the United States Supreme Court, encompasses the authority to issue interim standstill relief “pending a determination [whether] . . . action should be taken by the Commission.” *United States v. Southwestern Cable Co.*, 392 U.S. 157, 180 (1968). Specifically, in *Southwestern Cable*, the Supreme Court held that an interim order was authorized under Section 154(i) that preserved the status of competition between the parties and the scope of a party’s business operations while the Commission conducted formal hearings.⁷

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in section 271.”).

⁷ In that case, the Commission was conducting an inquiry into the propriety of regulating service area restrictions on participants in the burgeoning community antenna television (“CATV”) (continued . . .)

Any doubt about the Commission's authority in this regard is laid to rest by the Commission's *Ameritech Standstill Order* in connection with Ameritech-Qwest "teaming" agreement. Citing *Southwestern Cable*, AT&T sought a cease and desist order from the Commission that would forbid Ameritech from enrolling additional customers under its teaming agreement with Qwest. Ameritech argued that the Commission lacked authority under Section 4(i) to issue such relief, contending that the Commission first had to hold a full-blown hearing on the merits of AT&T's claims. *Ameritech Standstill Order* ¶ 9. The Commission squarely rejected this claim, finding it would "fundamentally undermine the concept of interim relief." *Id.* ¶ 14 n. 45.

In analyzing the appropriateness of injunctive relief, the Commission follows the traditional test for injunctive relief followed by the courts of appeals, assessing the merits of the requested relief and whether the equities favor the requested relief. *See Comark Cable Fund v. Northwestern Indiana Tel. Co.*, 104 FCC.2d 451, 456 (1985). Like the courts, the Commission also uses a sliding scale. *Ameritech Standstill Order* ¶ 14. Thus, for example, a strong show on the merits lessens the need to show irreparable harm.

Both factors support issuance of preliminary injunctive relief. As explained above, Verizon's conduct is a facial violation of section 271(a); only the extent of the violation is unclear. Given the strength of AT&T's merits showing, even a minimal showing of irreparable harm would suffice to support injunctive relief.

But the equities too strongly support a cease and desist order. Forbidding Verizon from continuing to send bill inserts (or other misleading marketing materials) can impose no

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market, and to preserve the *status quo* the Commission ordered the respondent to limit its service
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cognizable harms on Verizon. Verizon has not received long distance authority in New Jersey and, therefore, cannot be said to be harmed by an order that forbids Verizon from misrepresenting to consumers that it has obtained such authority.

The harm to AT&T and other long distance carriers is clearly irreparable. To the extent that New Jersey residents believe, incorrectly, that Verizon is now permitted to offer long distance service, it is almost impossible “to undo or rectify” that misperception. *Ameritech Standstill Order* ¶ 23. Verizon would, therefore, obtain the anticompetitive “jumpstart” that it has been pursuing through its illegal marketing efforts. Likewise, Verizon’s local competitors are irreparably harmed because it makes it much more difficult for them to win away existing Verizon customers if these customers believe, incorrectly, that Verizon can offer a comparable “one-stop” package.

Finally, as the Commission found in issuing a standstill order against the Qwest-Ameritech teaming agreement, injunctive relief in this context is necessitated by the public interest.

In the 1996 Act, as a key part of its new framework for transitioning local telephone markets to competition, Congress explicitly prohibited the BOCs from providing in-region interLATA services unless and until they show to the Commission that they have met certain conditions, including a showing that they have satisfied certain market opening requirements. . . . If we allow Ameritech to continue to implement its arrangement, and then ultimately find the arrangement unlawful, Ameritech would already have provided in-region interLATA service without authorization, in violation of the careful balance Congress sought to strike in section 271. We find that allowing the agreement to go forward before these important questions of lawfulness are resolved imposes a strong risk of upsetting the balance struck by Congress in section 271. In fact, in the absence of a standstill order it will be virtually impossible to “unscramble” the effects of the agreement and return to the current *status quo*. These important

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area to that in existence on the date of the Commission’s injunction order.

public interest factors, viewed in light of the significant questions regarding the legality of the agreement, weigh heavily in favor of granting the standstill order.

Ameritech Standstill Order ¶ 24. Here, given that the illegality of the type of marketing being undertaken by Verizon has now been clearly established by the *Qwest Teaming Order*, the public interest case for injunctive relief is even stronger.

B. The Commission Should Order Verizon To Provide The Documentation Necessary To Determine The Full Extent Of Its Billing Insert Misconduct And Open A Broader Inquiry Into Other Possible Violations of Section 271 By Verizon.

As described above, the mailing inserts sent out by Verizon are part of an orchestrated campaign by Verizon to jump the gun and gain a head start in providing long distance *before* it has demonstrated that its markets are open to competition. Without a thorough investigation by the Commission, there is simply no way to know the full extent of Verizon's misconduct related to the billing inserts. For example, New Jersey residents who respond to Verizon's billing inserts may in fact have been "signed up" as Verizon long distance customers or put on a "waiting list." Thus, Verizon should be required to submit a sworn statement by June 17, 2002 that details: i) the scope of the impermissible mailings; ii) the number of customer inquiries received in response to the mailings; iii) how those inquiries were handled by Verizon employees, including whether Verizon identified through oral or mechanical means the telephone number or identity of the caller, and whether any Verizon employees offered to change the customer's primary interexchange carrier or to place the customer on any time of "waiting list"; iv) what remedial steps have been taken to notify customers of the false statements; and v) and what steps Verizon is taking to prevent further such violations of section 271.

In addition, Verizon should be directed to submit to the Commission all documents relating to the improper billing inserts, including any customer representative instructions or "scripts" for responding to inquiries.

More broadly, given the violations disclosed to date, there are strong reasons for believing that Verizon is engaging in other impermissible marketing efforts that have not yet been discovered. Thus, the Commission should open a broader inquiry to explore whether such violations are occurring. In particular, the Commission should investigate whether other marketing channels – including Verizon’s customer care centers – have been used to inform New Jersey residents (incorrectly) that Verizon has obtained section 271 authorization.

Again, the Commission has ample authority to issue this relief. Numerous provisions of the Act grant the Commission broad authority to investigate alleged violations of the Act. For example, Section 205 states that “upon a complaint or under an order for investigation and hearing made by the Commission on its own initiative” the Commission may “order that [a] carrier . . . cease and desist” any violations of the Act. Likewise, Section 4(j) states that “[t]he Commission may conduct its proceedings in such manner as will best conduce to the proper dispatch of business and to the ends of justice.” Indeed, most broadly, “[t]he Commission may obtain from . . . carriers . . . full and complete information necessary to enable the Commission to perform its duties and carry out the objects for which it was created.” 47 U.S.C. § 218.

C. The Commission Should Reject Verizon’s Section 271 Application.

Finally, Verizon’s conduct requires that the Commission reject Verizon’s section 271 application. AT&T and others have already demonstrated in prior filings in this proceeding that Verizon has not satisfied the checklist or its public interest requirements. Verizon’s violation of Section 271(a) provides an independent ground for rejecting Verizon’s application.

More specifically, the Commission is required to determine in assessing a BOC application for in-region, interLATA authority whether “the requested authorization is consistent with the public interest, convenience, and necessity.” 47 U.S.C. § 271(d)(3)(C). As the Commission has explained, the public interest standard is not met where there is “evidence that a

BOC applicant has engaged in discriminatory or other anticompetitive behavior, or failed to comply with state and federal telecommunications regulations.” *Michigan 271 Order* ¶ 397. “Because the success of the market opening provisions of the 1996 Act depend, to a large extent, on the cooperation of incumbent LECs, including the BOCs, with new entrants in good faith compliance by such LECs with their statutory obligations, evidence that a BOC has engaged in a pattern of discriminatory conduct, or disobeying federal and state telecommunications regulations would tend to undermine our confidence that the BOC’s local market is, or will remain, open to competition once the BOC has received interLATA authority.” *Id.* Thus, evidence “that a BOC applicant has violated federal telecommunications regulations . . . is relevant to [the Commission’s] inquiry under section 271.” *Id.* ¶ 374.

Here, as demonstrated above, Verizon is currently violating Section 271(a) and there is strong evidence suggesting that this violation is part of an overall campaign to reap the benefits of offering long distance prior to securing the necessary authorization. Congress recognized that the market opening provisions of the Act would only work successfully only if there was an absolute prohibition on a BOC’s provision of long distance until its local markets were fully opened to competition. Allowing Verizon to obtain section 271 authority under these conditions would be tantamount to giving it a free pass.

CONCLUSION

For the foregoing reasons, the Commission should (1) order Verizon to cease and desist from its ongoing violations of Section 271(a); (2) require Verizon to submit the detailed information above regarding the scope of the billing insert misconduct and what remedial actions are being taken; (3) open an investigation into the full extent of Verizon's violation of section 271(a) in New Jersey; and (4) deny Verizon's application of interLATA authorization in New Jersey.

Respectfully submitted,

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June 13, 2002

CERTIFICATE OF SERVICE

I hereby certify that on this 13th day of June, 2002, I caused true and correct copies of the forgoing Comments of AT&T Corp. to be served on all parties by mailing, postage prepaid to their addresses listed on the attached service list.

Dated: June 13, 2002
Washington, D.C.

/s/ Patricia Bunyasi

Patricia Bunyasi

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